

AO 91 (Rev. 11/11) Criminal Complaint

**Sealed**Public and unofficial staff access  
to this instrument are  
prohibited by court order.

## UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States Courts  
Southern District of Texas  
FILED

APR 29 2015

David J. Bradley, Clerk of Court

United States of America

v.

Jeremy Marcell Davis

Case No.

**H15-573 M**

Defendant(s)

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 24, 2015 in the county of Harris in the  
Southern District of Texas, the defendant(s) violated:*Code Section**Offense Description*

18 U.S.C. Section 2113(b)

Bank robbery

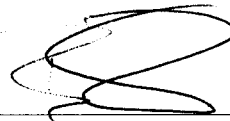
18 U.S.C. Section 2113(d)

Use of a deadly weapon during the commission of Bank robbery

18 U.S.C. Section 924c(A)(1)(ii)  
and 2

Carrying and brandishing a weapon

This criminal complaint is based on these facts:

☒ Continued on the attached sheet.

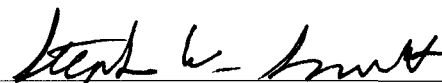
Complainant's signature

Bryan M. Ellis Special Agent, FBI

Printed name and title

Sworn to before me and signed in my presence.

Date:

April 29, 2015

Judge's signature

City and state:

Houston, Texas

Stephen W. Smith US Magistrate Judge

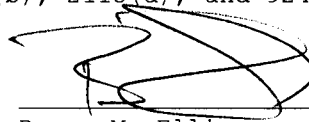
Printed name and title

I, Bryan M. Ellis, (hereafter Affiant), being duly sworn, do hereby depose and state:

1. I am a Special Agent with the Federal Bureau of Investigation (FBI) assigned to the FBI Violent Crimes Task Force (VCTF), which is comprised of agents from the FBI, officers from the Houston Police Department (HPD), and deputies from the Harris County Sheriff's Office (HCSO). I have been a Special Agent with the FBI for approximately 5 years. Based on my training and experience as an FBI agent, I am familiar with federal firearms violations, the Hobbs Act, and federal bank robbery violation. As an FBI agent I have been involved in numerous Hobbs Act and bank robbery investigations.
2. This affidavit is submitted in support of an arrest warrant and criminal complaint charging JEREMY MARCELL DAVIS, DOB: 08/14/1991 with:
  - a. Bank robbery, in violation of 18 U.S.C. Section 2113(b)
  - b. Bank robbery, in violation of 18 U.S.C. Section 2113(d)
  - c. Carrying and brandishing a weapon, in violation of 18 U.S.C. Section 924c(1)(A)(ii) and 2
3. The facts contained in this affidavit are based upon information provided to me by other law enforcement officers, other witnesses, and my own personal knowledge. Since this affidavit is made for the limited purpose of supporting a criminal complaint, I have not set forth each and every fact learned during the course of the investigation. Rather, I have set forth only those facts that I believe are necessary to establish probable cause for the crime charged. Unless otherwise indicated, where actions, conversations, and statements of others are related herein, they are related in substance and in part only.
4. On January 24, 2015, Amegy Bank, 800 Town and Country Boulevard Suite 110, Houston, Texas, whose deposits are insured by the Federal Deposit Insurance Corporation (FDIC), was robbed in an armed take-over style bank robbery by UNSUB1 (later identified as JEREMY MARCELL DAVIS) and UNSUB2. DAVIS and UNSUB2 were armed with handguns and wearing masks.
5. DAVIS, jumped over the teller counter and, in doing so, planted the palm of his bare hand on the top of the counter. DAVIS pointed a handgun at the teller, placing the teller in fear of death. DAVIS yelled at the teller, "Where's all the money? Give me all the money!" DAVIS removed US currency from the teller drawers. UNSUB2 remained in the lobby, pointing a handgun at customers and employees, telling them to "keep your hands up." DAVIS and UNSUB2 then fled on foot.
6. On that same date, January 24, 2015, Houston Police Department Crime Scene Unit (HPD CSU) responded to Amegy Bank, 800 Town and Country Boulevard Suite 110, Houston, Texas, to process the scene for forensic evidence. Still photographs taken from surveillance video were retrieved and utilized to determine the exact location DAVIS placed his ungloved hand on the

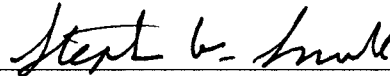
teller counter. A yellow post-it attached to the teller side of the counter is seen in the still photos where DAVIS placed his left hand on the counter. The post-it was used as a reference point for CSU to check for the presence of latent prints. (A still photograph is attached hereto). Latent prints were recovered from the aforementioned location and submitted for processing to the Houston Forensic Science Center, Forensic Analysis Division, Latent Print Section.

7. The latent prints of value recovered from the counter at Amegy Bank were searched through the Federal Bureau of Investigation (FBI) Next Generation Identification System (NGI), and were compared to the finger and palm print records of JEREMY MARCELL DAVIS, FBI#839159KD7. Results of comparisons by the Houston Forensic Science Center Forensic Analysis Division, Latent Print Section determined the latent prints recovered from Amegy Bank on January 24, 2015 matched the left palm print of JEREMY MARCELL DAVIS, FBI#839159KD7.
8. Further investigation revealed DAVIS does not have an account with Amegy Bank. Amegy Corporate Security has no record of DAVIS conducting any transactions on January 23 or January 24, 2015 at 800 Town and Country Boulevard Suite 110, Houston, Texas.
9. Based on the foregoing, I believe there is probable cause that on January 24, 2015, JEREMY MARCELL DAVIS did knowingly and intentionally take and carry away with the intent to steal, money exceeding \$1,000 belonging to or in the care custody and control, management, or possession of any bank, credit union or savings and loan association, namely, United States currency, which was in the possession of Amegy Bank, an FDIC insured bank, located at 800 Town and Country Boulevard suite 110, Houston, Texas. During the commission of the above offense, DAVIS did place in jeopardy the life of a person by the use of a dangerous weapon or device and in the process of doing so did aid and abet and knowingly carry and brandish a firearm, namely a handgun, during and in relationship to a crime of violence all in violation of 18 U.S.C. Sections 2113(b), 2113(d), and 924c(1)(A)(ii) and 2.



Bryan M. Ellis  
Special Agent  
Federal Bureau of Investigation

Sworn to and subscribed before this 29<sup>th</sup> day of April, 2015 and I find probable cause.



Stephen W. Smith  
United States Magistrate Judge

